

# **EXHIBIT A**

**Adam B. Lederman, Esq. - 015072008**  
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Attorneys for Plaintiff(s),

Venesha McClaire,

Plaintiff(s),

- vs -

Costco Wholesale Corporation, DDR Southeast  
East Hanover, L.L.C. a/k/a Inland Southeast  
East Hanover, L.L.C., Site Centers Corp., John  
Does 1-10 (fictitious names representing  
unknown individuals) and/or XYZ Corps. 1-10  
(fictitious names representing unknown  
corporations, partnerships and/or Limited  
Liability Companies or other types of legal  
entities)

Defendant(s).

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: MORRIS COUNTY

DOCKET NO: MRS-L-

Civil Action

COMPLAINT AND JURY DEMAND

Plaintiff Venesha McClaire residing in the County of Essex, 602 Sanford Avenue,  
Newark, New Jersey, 07106, by way of Complaint against the Defendants says:

FIRST COUNT

1. On or about September 18, 2020, the Plaintiff Venesha McClaire was a business invitee lawfully upon the premises owned, operated, leased, controlled, supervised, managed and/or maintained and/or repaired and/or inspected by the Defendants Costco Wholesale Corporation, DDR Southeast East Hanover, L.L.C. a/k/a Inland Southeast East Hanover, L.L.C. (hereinafter referred to as "Inland Southeast East Hanover, L.L.C."), Site Centers Corp., John Does 1-10 and/or XYZ Corps. 1-10 located at or near 156 Route 10, in the Township of East Hanover, County of Morris, and the State of New Jersey.

2. Upon information and belief, at all relevant times herein mentioned, the Defendant Costco Wholesale Corporation was a foreign profit corporation authorized to do business in the State of New Jersey, with its main business address located at 999 Lake Drive, Issaquah, Washington, 98027.

3. Upon information and belief, at all relevant times herein mentioned, the Defendant Inland Southeast East Hanover, L.L.C. was a foreign limited liability company authorized to do business in the State of New Jersey, with its main business address located at 3300 Enterprise Parkway, Beachwood, Ohio, 44122.

4. Upon information and belief, at all relevant times herein mentioned, the Defendant Site Centers Corp. was a foreign profit corporation authorized to do business in the State of New Jersey, with its main business address located at 3300 Enterprise Parkway, Beachwood, Ohio, 44122.

5. At the aforesaid time and place, due to the careless, reckless and negligent ownership, operation, lease, control, supervision, management and/or maintenance and/or repair and/or inspection of the premises by the Defendants Costco Wholesale Corporation, Inland

Southeast East Hanover, L.L.C., Site Centers Corp., John Does 1-10 and/or XYZ Corps. 1-10, the Plaintiff Venesha McClaire was caused to slip and fall, thereby causing the Plaintiff Venesha McClaire to sustain severe personal injuries.

6. As a direct and proximate result of the aforesaid carelessness, recklessness, and negligence of the Defendants Costco Wholesale Corporation, Inland Southeast East Hanover, L.L.C., Site Centers Corp., John Does 1-10 and/or XYZ Corps. 1-10, the Plaintiff Venesha McClaire was injured in and about her mind and body; was and will in the future be caused great pain and suffering to her mind and body; was and will in the future be obliged to expend great sums of money for medical aid and attention; has sustained economic loss; and was and will in the future be unable to attend to her usual pursuits and occupations and was further damaged.

WHEREFORE, the Plaintiff Venesha McClaire demands judgment against the Defendants Costco Wholesale Corporation, Inland Southeast East Hanover, L.L.C., Site Centers Corp., John Does 1-10 and/or XYZ Corps. 1-10, individually, jointly or severally, for damages together with interest and costs of suit.

#### SECOND COUNT

1. Plaintiff Venesha McClaire repeats each and every allegation of the First Count of the Complaint as if set forth at length herein verbatim.

2. At the aforesaid time and place, the Defendants Costco Wholesale Corporation, Inland Southeast East Hanover, L.L.C., Site Centers Corp., John Does 1-10 and/or XYZ Corps. 1-10 were independent contractors responsible for the upkeep and/or maintenance and/or repairs and/or inspection of the aforementioned premises.

3. As a direct and proximate result of the careless, reckless, and negligent upkeep and/or maintenance and/or repair and/or inspection of the premises by the Defendants Costco

Wholesale Corporation, Inland Southeast East Hanover, L.L.C., Site Centers Corp., John Does 1-10 and/or XYZ Corps. 1-10, the Plaintiff Venesha McClaire was caused to slip and fall, thereby causing the Plaintiff Venesha McClaire to sustain severe personal injuries.

4. As a direct and proximate result of the aforesaid carelessness, recklessness and negligence of the Defendants Costco Wholesale Corporation, Inland Southeast East Hanover, L.L.C., Site Centers Corp., John Does 1-10 and/or XYZ Corps. 1-10, the Plaintiff Venesha McClaire was injured in and about her mind and body; was and will in the future be caused great pain and suffering to her mind and body; was and will in the future be obliged to expend great sums of money for medical aid and attention; has sustained economic loss; and was and will in the future be unable to attend to her usual pursuits and occupations and was further damaged.

WHEREFORE, the Plaintiff Venesha McClaire demands judgment against the Defendants Costco Wholesale Corporation, Inland Southeast East Hanover, L.L.C., Site Centers Corp., John Does 1-10 and/or XYZ Corps. 1-10, individually, jointly or severally, for damages together with interest and costs of suit.

### THIRD COUNT

1. Plaintiff Venesha McClaire repeats each and every allegation of the First and Second Counts of the Complaint as if set forth at length herein verbatim.

2. At the aforesaid time and place, the Defendants John Does 1-10 was an unknown person or persons whose actions caused and/or contributed, directly or indirectly, to the incident herein and the injuries and damages suffered by the Plaintiff Venesha McClaire.

3. At the aforesaid time and place, the Defendants XYZ Corps. 1-10 was an unknown business, corporation and/or entity, whose agents, servant and/or employee's actions

caused and/or contributed, directly or indirectly, to the incident herein and the injuries and damages suffered by the Plaintiff Venesha McClaire.

4. As a direct and proximate result of the aforesaid carelessness, recklessness and negligence of the Defendants John Does 1-10 and/or XYZ Corps. 1-10, the Plaintiff Venesha McClaire was injured in and about her mind and body; was and will in the future be caused great pain and suffering to her mind and body; was and will in the future be obliged to expend great sums of money for medical aid and attention; has sustained economic loss; and was and will in the future be unable to attend to her usual pursuits and occupations and was further damaged.

WHEREFORE, the Plaintiff Venesha McClaire demands judgment against the Defendants John Does 1-10 and/or XYZ Corps. 1-10 individually, jointly or severally, for damages together with interest and costs of suit.

DAVIS, SAPERSTEIN & SALOMON, P.C.  
Attorneys for Plaintiff(s)

*Adam B. Lederman*

Dated: May 21, 2021

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BY: Adam B. Lederman, Esq.  
For the Firm

JURY DEMAND

Plaintiff hereby demands a trial by jury on all triable issues raised in the various Counts of the Complaint.

DESIGNATION OF TRIAL COUNSEL

Plaintiff hereby designates Adam B. Lederman, Esq. as trial counsel in this matter.

DAVIS, SAPERSTEIN & SALOMON, P.C.  
Attorneys for Plaintiff(s)

*Adam B. Lederman*

Dated: May 21, 2021

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BY: Adam B. Lederman, Esq.  
For the Firm

DEMAND FOR ANSWERS TO INTERROGATORIES

Pursuant to Rule 4:17-1(B)(1), et seq., Plaintiff hereby demands that Defendant answer Form "C" Uniform Set of Interrogatories of Appendix II, and supplemental Form "C2", within the time prescribed by the Rules of Court.

Plaintiff reserves the right to propound additional supplemental Interrogatories pursuant to the Rules of Court.

CERTIFICATION

I certify, pursuant to R.4:5-1, that to the best of my knowledge, information and belief at this time, the matter in controversy is not the subject matter of any other action pending in any other court, nor of any pending arbitration proceeding; that no other action or arbitration is contemplated; and that there are no other parties who should be joined in this action.

DAVIS, SAPERSTEIN & SALOMON, P.C.  
Attorneys for Plaintiff(s)

*Adam B. Lederman*

Dated: May 21, 2021

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BY: Adam B. Lederman, Esq.  
For the Firm

## Civil Case Information Statement

### Case Details: MORRIS | Civil Part Docket# L-001127-21

**Case Caption:** MCCLAIRE VENESHA VS COSTCO  
WHOLESALE COR PORATIO  
**Case Initiation Date:** 05/21/2021  
**Attorney Name:** ADAM B LEDERMAN  
**Firm Name:** DAVIS SAPERSTEIN & SALOMON PC  
**Address:** 375 CEDAR LN  
TEANECK NJ 07666  
**Phone:** 2019075000  
**Name of Party:** PLAINTIFF : McClaire, Venesha  
**Name of Defendant's Primary Insurance Company**  
(If known): SELF INSURED

**Case Type:** PERSONAL INJURY  
**Document Type:** Complaint with Jury Demand  
**Jury Demand:** YES - 6 JURORS  
**Is this a professional malpractice case?** NO  
**Related cases pending:** NO  
**If yes, list docket numbers:**  
**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO  
**Are sexual abuse claims alleged by: Venesha McClaire?** NO

### THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

**Please check off each applicable category: Putative Class Action?** NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

05/21/2021  
Dated

/s/ ADAM B LEDERMAN  
Signed